



September 24, 2013

Senior Judge Sterling Johnson, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Rakesh Lall, 11-cr-535(SJ)

Dear Judge Johnson:

I have recently been retained to represent Rakesh Lall in the above captioned matter and am writing to respectfully request a one month adjournment of Mr. Lall's scheduled surrender date to the Bureau of Prisons. My client was sentenced before this Court on April 26, 2013 to one year and one day incarceration and is currently scheduled to surrender to his designated institution this Friday, September 27, 2013.

The reason for this request is that there have been several developments in Mr. Lall's family since his date of sentencing, including the death of his brother, which has resulted in Mr. Lall taking on the responsibilities of caring for his brother's family, as well as issues with Mr. Lall's son. I have begun very preliminary discussions with AUSA Tanisha Payne regarding these issues and whether, given these new dynamics, it may be appropriate to make a motion to reconsider his sentence. However, I need a little more time to fully investigate these issues and have a more meaningful discussion with the Government. I have spoken with AUSA Tanisha Payne about this application and she has informed me that the Government takes no position regarding an adjournment of Mr. Lall's surrender date.

Wherefore, I respectfully request that Mr. Lall's current surrender date of September 27, 2013 be adjourned one month to October 28, 2013.

Respectfully submitted,

/s/ Timothy Parlatore

Timothy C. Parlatore, Esq.